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OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Gareth Wilson on behalf of Ruskin College and Welbeck Land

Organisation (if applicable): Twenty5 Planning Ltd

Address: [redacted]

Email:

Date: 12 03 2026

Data protection:
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	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
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Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	H1	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	○	○

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	☐
(b) justified?	☑	(d) consistent with national policy?	☐

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please refer to full representation response submitted.

Whilst support is given to the proposed allocations, particularly SPE14 Ruskin Field, concern is raised about how the Council has reached conclusions regarding the capacity of sites and anticipated delivery of such sites and therefore whether the proposed housing requirement is justified.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	SPE14
Policy Number	SPE 14	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	○ Yes	○ No
(b) is sound?	○ Yes	◉ No
	○	○

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

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Support is given to the identification of Ruskin Field as proposed allocation. However comments are made in response to the policy requirements as some are considered not to be adequately justified. Comments have also been made to seek to make the policy more effective to deliver the Promoter's identify capacity of a minimum of 130 dwellings at the Site.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please refer to full representation response submitted for suggested amendments to policy wording.

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	H4	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	◉ Yes	○ No
	○	○

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

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Support is given to proposed Policy H4 and the supporting text which clarifies that employer-linked affordable housing can be delivered at sites in conjunction with market housing and other affordable housing, such as at proposed allocation Site Ruskin Fields (Policy SPE 14).

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph	Apendix 1.1	Policies Map	
Policy Number	S2	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	○	○

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

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Support is given to policy S2 but comments are made about the appropriateness for the 'Design Checklist' Appendix 1.1, which repeats other policy requirements, to be contained as part of the Local Plan.

If the Design Checklist is to remain as part of the Local Plan it is necessary for the wording to be consistent with any changes to policy wording.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please refer to full representation response submitted.

If the Design Checklist is to remain as part of the Local Plan it is necessary for the wording to be consistent with any changes to policy wording.

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	HD4	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	○	○

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To make draft policy HD4 more effective, it is considered necessary to establish some criteria upon which non-designated heritage assets pertaining to be 'local heritage assets' can be classified.

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Paragraph		Policies Map	
Policy Number	HD5	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

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Minor administrative comment is made to correct policy referencing.

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	HD6	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	○	○

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

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To improve the effectiveness of the policy it should be made clear which part of Policy HD6 relates to sites within the Historic Core Area and designated View Cones, and which part of the policy relates to proposed 'tall buildings', or if necessary separate out the policy into 2 different policies.

Comments are also made about how to determine what a tall building is and when further assessment is required.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please refer to full representation response submitted.

Suggested policy amendments are proposed to provide clarity to the wording to better relate to the aspirations of the policy to retain and enhance the historic skyline of the Historic Core Area.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

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OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name:	Gareth Wilson on behalf of Ruskin College and Welbeck Land
Organisation (if applicable):	Twenty5 Planning Ltd
Address:	[redacted]
Email:	[redacted]
Date:	12 03 2026

Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☒ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

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When completing the form,

- You only need to complete Part A once
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- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

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planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	G3	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	☐
(b) justified?	☑	(d) consistent with national policy?	☑

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please refer to full representation response.

Whilst the principle of urban greening is supported, it is questioned whether it is appropriate to apply a blanket policy across all sites.

With reference to the National Planning Policy Framework and Natural England Guidance it is suggested that urban greening should targeted to development sites and locations where the level of urban greening is a significant planning issue such as re-development of brownfield sites and sites located in the Green Belt.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft

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Organisation (if applicable):	Twenty5 Planning Ltd
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When completing the form,

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Part B

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Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	R6	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	☐
(b) justified?	☐	(d) consistent with national policy?	☑

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please refer to full representation response submitted.

In order for the policy to comply with the National Planning Policy Framework, it is necessary for the policy to reflect that soils need to be protected in a manner commensurate with their statutory status and identified quality.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please refer to full representation response submitted.

Suggested policy wording amendments are proposed to better conform with the requirements of the National Planning Policy Framework.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

120

TWENTY5

Representations in response to Oxford City Council Local Plan Regulation 19 Consultation

Ruskin Fields, Headington

March 2026

TWENTY5

120

Representations to the Oxford City Local Plan 2045 Submission Draft Regulation 19 Consultation

Ruskin Fields, Headington, Oxford

March 2026

Prepared for: Ruskin College and Welbeck Land

Revision	Description	Author	Date	Independent Review	Date
01	Draft	LV	11/03/2025	GW	11.03.26
02	Final	LV	12/03/2025		

The conclusions in the Report titled **Ruskin Fields** are Twenty5 Planning Limited's (Twenty5) professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Twenty5 was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Twenty 5 has assumed all information received from Client (the "Client") and third parties in the preparation of the Report to be correct. While Twenty5 has exercised a customary level of judgment or due diligence in the use of such information, it assumes no responsibility for the consequences of any error or omission contained therein.

This Report is intended solely for use by the Client in accordance with Twenty5's contract with the Client. While the Report may be provided by the Client to applicable authorities having jurisdiction and to other third parties in connection with the project, Twenty5 disclaims any legal duty based upon warranty, reliance or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

Contents

1 Introduction 4

2 Ruskin Fields, Headington 6

3 Policy H1: Housing Requirement 9

4 Policy SPE 14: Ruskin Field and Policies Map 11

5 Policy H4: Employer-Linked Affordable Housing 20

6 Policy S2: High-Quality Design 21

7 Policy HD4: Non-Designated Heritage Assets 22

8 Policy HD5: Archaeology 23

9 Policy HD6: Views and Building Heights 24

10 Policy G3: Provision of new Green and Blue Features – Urban Greening Factor 26

11 Policy R6: Soil 28

12 Summary 30

Appendices

Appendix 1 – Site Location Plan

1 Introduction

1.1.1 This Representation has been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Welbeck Land with respect to the Oxford City Council (OCC) Regulation 19 Local Plan Consultation which is open until 13th Mar 2026.

1.1.2 This document relates to land at Ruskin Fields, also referred to as 'Ruskin Field', Headington, Oxford. The Site including the access land extends to 3.66Ha (Appendix 1). It is identified for allocation at 'Policy SPE14: Ruskin Field'. The Site is entirely owned by Ruskin College (University of West London). Ruskin College has partnered with Welbeck Land to promote the Site and prepare an outline planning application.

Background

1.1.3 The Site has been identified by Ruskin College as surplus to future requirements with its disposal linked to generating capital for upgrading the college's facilities.

1.1.4 The Site was submitted for consideration as part of the Call for Sites by the Promoter in 2016, 2021 and most recently in 2025. OCC has assessed the development potential of the Site within its Strategic Land Availability Assessment using available technical evidence (SHLAA ref: 463).

1.1.5 The Site was identified for allocation as part of the Regulation 18 Local Plan and is retained within the proposed submission Local Plan at 'Policy SPE14: Ruskin Field'. The Site has been assessed as part of the supporting Sustainability Assessment.

1.1.6 Whilst support is given to the allocation made at Policy SPE14, it is of considerable concern that the policy significantly underestimates the capacity of the Site. The policy wording states *"The minimum number of dwellings to be delivered is 28 (or, if delivered as self-contained student rooms, the equivalent number of rooms when the relevant ratio is applied..."*.

1.1.7 Following extensive evidence gathering and design optioneering by the Promoter, it is evident that the Site has a far greater capacity of at least 130 dwellings, which can assist the Council to meet its local housing need within the extent of the City in a unique and highly sustainable location.

1.1.8 The Site is therefore promoted for a minimum of 130 homes with associated public open space, landscaping, infrastructure and access from Foxwell Drive.

1.1.9 The Site has been the subject of technical evidence base and consultation with OCC officers as part of a planning performance agreement. This has demonstrated that there are no known overriding constraints to the development.

1.1.10 The Promoter can therefore confirm that Ruskin Fields is suitable, available, deliverable, and has the capacity to provide a minimum of 130 homes in the first five-years of the new local plan period.

Structure of Statement

1.1.11 According to the Local Development Scheme 2025-2030[1], the emerging OCC Local Plan is anticipated to be submitted for examination in June 2026 and as such it is anticipated that the emerging Local Plan will be examined against the requirements of National Planning Policy Framework (2024). Due consideration has been given to the requirements for plan making in this context.

1.1.12 This representation responds to the OCC Local Plan 2045 Submission Draft Regulation 19 Local Plan Consultation, as well as associated evidence published to date, thereby identifying key issues related to the soundness of the plan. Where appropriate, recommendations towards the making of a 'sound' plan are provided. As currently drafted the Promoter considers the Submission Draft Plan to be unsound.

[1] Local Development Scheme (LDS) | Oxford City Council

1.1.13 The structure of this report is as follows.

Relevant Background

- Ruskin Fields – Site Description and Context, The Proposal, Pre-Application Engagement

Response to Draft Local Plan

- Policy H1 ‘Housing Requirement’
- Policy SPE 14 ‘Ruskin Field’
- Policy H4 ‘Employer-Linked Affordable Housing’
- Policy S2 ‘High-Quality Design’
- Policy HD4 ‘Non-Designation Heritage Assets’
- Policy HD5 ‘Archaeology’
- Policy HD6 ‘Views and Building Heights’
- Policy G3 ‘Provision of new Green and Blue Features – Urban Greening Factor’
- Policy R6 ‘Soil Quality’

2 Ruskin Fields, Headington

Site Description and Context

2.1.1 The Site is located entirely within Oxford City. It comprises private land not designated as greenbelt or any other form of protected public open space and is not part of a formal green Infrastructure network. It is characterised by grass fields bounded by intermittent tree lines, woodland and hedgerows. The Site has previously been granted planning permission for a 'trim trail' comprising seven timber exercise stations for use by Ruskin College but this permission was not implemented.

2.1.2 Immediately to the north, the Site is bound by the A40 North Way (Northern Bypass Road), beyond which lies Barton Park, a mixed-use development with permission for up to 850 dwellings currently under construction.

2.1.3 To the south, the Site is bound by land owned by Ruskin College, and then the College itself, which comprises a combination of academic buildings, student accommodation and ancillary development. To the west, the Site is bound by Dunstan Park and residential dwellings located along Foxwell Drive.

2.1.4 To the east the Site is bound by Stoke Place, a public footpath, and beyond, a residential dwelling. John Radcliffe Hospital is situated 650m south of the Site.

2.1.5 The Site is located within the Old Headington Conservation Area. Land required for the access from Foxwell Drive is not within the Conservation Area.

2.1.6 The Site contains no designated heritage assets. The Grade II listed walls of the Walled Garden and the Grade II listed Rookery (which is now a part of the College complex) lie approximately 150m and 200m respectively to the south of the Site. The land between the listed walls and the Rookery and the Site itself is allocated for development in the current Local Plan, although the Regulation 19 Draft Local Plan has not carried this allocation forward.

2.1.7 The Site has a varied topography, with the lowest part of the site at the northern boundary (73m AOD), and the highest point of the site at the southern boundary (85.8m AOD).

2.1.8 The Site is located within Flood Zone 1, the lowest risk of flooding according to Government Mapping. There is an existing ditch which runs through the Site from south to north. Part of the Site (to the east and north) are affected by surface water flooding as identified on Government mapping. Designs can be achieved whilst avoiding any built development in these areas.

2.1.9 The Site is well positioned to connect to the wider active travel network. There are bus stops located within 400m to the west of the Site at Dunston Park (Foxwell Drive). There are additional bus stops at Halliday Hill and at the John Radcliffe Hospital. The X3 provides regular connections (every 20 minutes) to Oxford City Centre from Dunston Park. The number 14 bus service provides regular services, increased at peak travel times, and direct connections from Halliday Hill to Oxford Rail Station. Alternatively, travel by cycle from the Site to the train station is approximately 20 minute journey. The Site is therefore considered to be highly accessible and sustainable.

2.1.10 Local retail, including food stores, are located at Westlands Drive, Northway and at 'Headington High Street' (along Old High Street and London Road) approx. 1km to the south of the Site. The 'Old Headington Village Hall' is located approx.500m to the south of the Site. The Site is in proximity to other local facilities and services including General Practitioner, public houses, and restaurant.

2.1.11 There are several primary schools in proximity to the Site including New Marston Primary School, St Joseph's Catholic Primary School St Andrew's Church of England Primary School,

as well as Barton Park Primary School.

The Proposal

2.1.1 The Site is promoted for a minimum of 130 homes with associated public open space, landscaping, infrastructure and access from Foxwell Drive.

2.1.2 Policy H2 of the Draft Local Plan requests a minimum of 40% affordable housing (subject to viability) at sites not located within the Green Belt, as such the Site could deliver a minimum of 52 affordable dwellings which will make an important contribution towards housing supply within the City.

2.1.3 Given the sustainable location of the Site, in close proximity to key employment locations including the John Radcliffe Hospital, it provides a unique opportunity to deliver key worker housing / employer-linked affordable housing.

2.1.4 Vehicular and pedestrian access to the Site is proposed via Foxwell Drive. OCC owns the area of land between the Site and Foxwell Drive and has agreed to sell part of this land to Ruskin College in order to facilitate vehicular access directly onto Foxhall Drive. It is reiterated that the land required for the access is not located within the Conservation Area. It is acknowledged that it will be necessary to remove a small number of trees to facilitate the access, and this loss will be compensated for via new tree planting and landscaping on Site.

2.1.5 Connection through the Site to Stoke Place would create new walking and cycling routes to allow residents to reach the local area more easily. This would bring about wider connectivity benefits for existing local residents. The Site is in a highly sustainable location with a real opportunity for reduced levels of car parking to reflect the proximity to local services and bus stops.

2.1.6 It is proposed that the majority of built development will be set back from A40 (Northern Bypass Road) in order to maximise offset from vehicular noise sources. This offset will also facilitate the creation of significant public open space which would connect to both the existing public right of way network and proposed new connections to Stoke Place. The creation of public open space and green corridors would provide opportunities for recreation and health and wellbeing benefits.

2.1.7 The design approach is landscape-led responding to constraints and topography, retaining the majority of affected trees and vegetation whilst enhancing the environment. The broad location for Sustainable Drainage Systems (SUDs) in the form of surface water attenuation basins and swales is along the northern boundary of the Site. This design approach provides opportunity for the blue infrastructure to be fully integrated with the green infrastructure in an ecologically informed way to provide a fully accessible, attractive and biodiverse recreational benefit for the nearby communities. The introduction of new wetland habitat and landscaping will incorporate opportunities for a net gain in biodiversity on Site.

Pre-Application Engagement

2.1.12 The Promoter has entered into a Planning Performance Agreement with the Council involving multiple design and planning workshops to form the development concepts with officer input. In addition, the Promoter has engaged with local communities and interest groups to seek their feedback on the proposals. It is anticipated that an application could be submitted in Summer 2026.

2.1.13 The Promoter has commissioned supporting technical evidence base which has been shared with Officers at Oxford City Council as part of Regulation 18 Local Plan consultation and pre-application engagement. This relates to:

- Arboriculture – Baseline tree surveys identify the location, quality, root protection

zones, and heights of existing trees at the site.

- Preliminary Ecological Appraisal and associated species surveys – identify the proximity of the site to ecological designations and the baseline ecological position. Additional survey work will be completed and submitted as part of the forthcoming planning application. It concludes that the proposed development is unlikely to have a significant impact upon the integrity of the protected areas.

- Flood Risk Technical Note – which identifies the flood risk potential at the site and outlines the current drainage regime, which is proposed to be continued subject to agreement with the Lead Local Flood Authority.

- Landscape Technical Note and agreed viewpoints – to enable consideration of the impact of the proposal upon the landscape. It is reiterated that this will be considered in the context of the existing built development such as Ruskin College and prominent John Radcliffe Hospital. This work has informed the initial design approach to incorporate green corridors within the proposal. For clarity, the Site is not within Elsfield View Cone towards Oxford City Centre Historic Core as clearly identified at Figure 1.2 of the 'Assessment of the Oxford View Cones 2015 Report'.

2.1.14 A Desk Based Heritage Report has been prepared which considers the heritage context of the Site. Consideration has been given to the Old Headington Conservation Appraisal (2011) which identifies key views across the Site. It also takes into account the large modern extension to the Rookery Building at Ruskin College and recent development at Barton Park. It is clear that the context has evolved as a result of this recent development.

2.1.15 The Promoter has also engaged with relevant OCC Officers to agree the methodology for air quality and acoustic monitoring. The results of which will inform parameters of development and the detailed site layout. Initial analysis has identified neither noise or air quality are considered to be significant constraints to development at the Site.

2.1.16 It has been highlighted by stakeholders that there may be potential for peat geology and potential for associated archaeological remains at the eastern field parcel. The Promoter has secured a project brief from OCC Archaeology Officer for the geo-archaeological borehole, test pit survey, and assessment. This brief has been agreed by the Historic England Regional Scientific Advisor. This work will be properly investigated by suitably qualified archaeologist. The Promoter has commissioned the same archaeologists that worked on the adjacent Dunstan Park site. The results of this assessment will further inform proposals and will be submitted as part the planning application.

Summary

2.1.17 The Site has been the subject of technical evidence base and consultation with OCC Officers as part of a Planning Performance Agreement. This has demonstrated that whilst the Site has constraints, none would prevent a minimum of 130 dwellings from being delivered.

2.1.18 Through a sensitive design approach, which responds to the Site and its context, a successful landscape led residential development, integrating significant public open space, set within a canopy of large trees can be achieved at the Site.

2.1.19 The Promoter therefore confirms that Ruskin Fields is suitable, available, deliverable, and has the capacity to provide a minimum of 130 to 160 homes in the first five-years of the new local plan period.

3 Policy H1: Housing Requirement

3.1.1 The Draft Local Plan identifies at page 1 that:

"Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and demand continues to outstrip supply. This exacerbates inequalities by leading to high property prices and a limited supply of affordable housing. This means that many lower paid essential workers cannot afford to live in the city and employers experience high staff turnover and vacancy rates which can affect their operation. This is particularly apparent in the city's schools, hospitals, care homes, public transport services, the building industry and the universities. Therefore, the supply of available and affordable housing for all is a priority for people, the economy and the services on which we all rely, including healthcare and education."

3.1.2 Notwithstanding this statement, the Council further explains at page 2 of the Draft Local Plan that:

"The minimum housing need figure for Oxford has been calculated by using the Government's Standard Method as set out in National Planning Policy and guidance. The housing need in Oxford is for 1,087 new dwellings per annum. However, this need is greater than the capacity of the city to deliver it. The assessment of capacity (set out in the Strategic Housing Land Availability Assessment 2026) is 9,267 homes over the plan period, or 463 dwellings per annum.

3.1.3 This approach and position is reiterated in Background paper 001[2]. It also explains the ongoing discussions with neighbouring authorities regarding the unmet need and reference to an interim statement of common ground.

3.1.4 Draft Policy H1 'Housing Requirement' states:

"Provision will be made for at least 9,267 new homes to be built in Oxford over the plan period 2025-2045 (average of 463 per annum).

Measures in the Local Plan to promote housing delivery include:

a)Making site allocations for residential uses in this Plan (see Chapter 8: Site allocations);

b) Promoting the efficient use and development of land/sites; and

c) Prioritising housing across the city and by allowing an element of housing on all employment sites if suitable."

3.1.5 Whilst support is given to the proposed allocations, particularly SPE14 Ruskin Field, concern is raised about how the Council has reached conclusions regarding the capacity of sites, anticipated delivery of such sites and therefore whether the proposed housing requirement is justified.

3.1.6 The Strategic Housing Land Availability Assessment (SHLAA) 2026[3] identifies the anticipated capacity at sites and expected timescales, however, in the case of Ruskin Field (SHLAA Ref: 463 and draft Allocation SPE14), it is considered both the capacity of the site and the timescales for delivery have been vastly underestimated. The SHALAA suggests the Site has a capacity of just 28 dwellings to be delivered during years 11-15 (2035/36 - 2039/40) of the plan period.

[2] https://www.oxford.gov.uk/downloads/file/3886/bgp-001-housing-need-requirement-and-mix-reg-19

[3] oxford-strategic-housing-land-availability-assessment-shlaa-january-2026-appendices

3.1.7 Making efficient use of the land proposed for allocation whilst respecting its context allows for a capacity to deliver a minimum of 130 dwellings, of which 52 would be affordable dwellings. This proposal would make a much more meaningful contribution towards both market and affordable housing supply within the City than suggested in the draft policy wording. As highlighted elsewhere within these representations, the Promoter is actively engaging in pre-application discussions and anticipates submitting a planning application during 2026. As such, the Site can make a significant positive contribution towards housing delivery in the first five years of the plan period on land outside of the greenbelt.

3.1.8 Please refer to additional comments made in response to draft Policy SPE14 ‘Ruskin Field’.

4 Policy SPE 14: Ruskin Field and Policies Map

4.1.1 The Oxford City Local Plan 2045 Submission Draft allocates land at Ruskin Field for residential development. The draft policy wording is provided for ease of reference:

"***Policy SPE14: Ruskin Field***

Planning permission will be granted for residential development, which may include employer-linked affordable housing or student accommodation. The minimum number of dwellings to be delivered is 28 (or, if delivered as self-contained student rooms, the equivalent number of rooms when the relevant ratio is applied. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The green character of the site is important to the setting of the Old Headington Conservation Area. The hedgerows and treelines are likely to have ecological value. For this reason, trees and hedgerows at the boundaries of the site and running through the site should be retained as far as possible, and opportunities taken for enhancement.

b) New native hedge and tree planting should connect existing trees and hedgerows.

c) Gardens and amenity spaces will need to have rich planting along boundaries to allow more diverse networks through the site for wildlife.

d) The southern part of the site should be kept as open space, with opportunities taken for enhancement, particularly of any wetland features, and/or extension of the deciduous woodland priority habitat to the south.

e) Detailed biodiversity surveys will be required at the right times of year to ascertain which if any protected species are present and any mitigations that may be needed.

f) Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (Policy R6). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

g) Significant green features should be incorporated to retain the function of the site as one of the few vestiges of the rural character of the conservation area, important to its setting and understanding its history.

*h) Buildings should be carefully placed to retain important views across the site and visual link with rural hills beyond, e.g. the important view from Stoke Place across the site to Elsfield (**Policy HD6)**.*

i) Built development should avoid the southern part of the site where there is a pond with potential for wetland species, and a greater potential for peat deposits. This area should be used for enhancements to biodiversity and green infrastructure.

j) Development should be kept low to reflect the rural character and role of the site in linking the conservation area to its more rural origins.

k) Development must be accompanied by a Landscape Visual Impact Assessment to demonstrate impacts.

*l) Development should be sensitive to the setting of the listed buildings nearby (**Policy HD3**).*

*m) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).*

Movement & access

n) Foxwell Drive is likely to provide the only option for vehicular access.

o) Stoke Place is not suitable for providing vehicular access, but access to it for walkers, cyclists and wheelers should be considered in order to ensure permeability.

Additional Requirements

p) Due to potential impacts of noise and other pollutants from traffic on the A40, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (Policies R4 and R8)."

4.1.2 **Strong support** is given to the identification of this proposed allocation however the following comments seek to improve the soundness of the proposed policy.

A) The minimum quantum of development is not justified

4.1.3 Draft Policy SPE 14 states:

"*Policy SPE14: Ruskin Field*

Planning permission will be granted for residential development, which may include employer-linked affordable housing or student accommodation. The minimum number of dwellings to be delivered is 28 (or, if delivered as self-contained student rooms, the equivalent number of rooms when the relevant ratio is applied. Other complementary uses will be considered on their merits.

4.1.4 Whilst it is noted that Policy SPE 14 is positively prepared by seeking a minimum of dwellings at the site, which can be exceeded, it is considered at there is insufficient justification for setting the 28 dwelling figure as the minimum site capacity within the draft policy wording.

4.1.5 The Local Plan evidence identifies that that the Oxford City local authority has tightly drawn administrative boundaries and as such there are limited sites available. There is a general approach within the Local Plan to facilitate appropriate development to come forward and in doing so there is strong emphasis on making efficient use of land available.

4.1.6 The NPPF highlights at paragraph 130 that:

"... Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

a) plans should contain policies to optimise the use of land in their area and meet as much of

the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range…"

4.1.7 Draft Policy HD2 'Making Efficient Use of Land' states "*It is expected that sites across the city will generally be capable of accommodating development at an increased scale and density to their surroundings."* It makes reference to densities at over 100dph in highly accessible locations, over 80 dph at gateway sites, and over 60dph will be expected in most other locations.

4.1.8 The OCC Local Plan Background Paper 016 'Efficient use of Land' explains that "….*when setting minimum densities for site allocations in semi-rural conservation area, a density of approximately 35 dwellings per hectare has generally been assumed. Higher densities may be possible, but this will need to be tested through detailed design".* Despite this, it is worth noting that this approach has not been written into the wording draft policy HD2.

4.1.9 The area of the proposed allocation extent for SPE14 is 3.51ha, at 35 dwellings per hectare, this would equate to a capacity of 123 dwellings. As such it is clear that the Council has taken a different approach to the identification of the minimum quantum of development at SPE14 than explained in the OCC Local Plan Background Paper 16 but has not provided the justification for this.

4.1.10 The Strategic Housing Land Availability Assessment (January 2026) site assessment concludes that the site (ref: 463)[4] is '*suitable and available*' and states the sites capacity is 28 dwellings.

4.1.11 Reference to '*a minimum of 28 dwellings*' is contained within the Sustainability Appraisal (Appendix C)[5] Site Assessment for SPE14: Ruskin Field in which it states "*The developer has expressed the intention to develop a minimum of 28 dwellings".* This statement does not accurately reflect the submissions made on behalf of the Promoter in respect of the capacity of Ruskin Fields.

4.1.12 In March 2025, it was stated on behalf of the Promoter as part of the Call for Sites response that the Site "*has a capacity to deliver c. 130 high quality residential dwellings alongside policy compliant levels of open space, access and accounting for all known constraints".*

4.1.13 Further, the Site was also identified for allocation within the Regulation 18 Local Plan, again within representations dated August 2025 made on behalf of the Promoter, it was stated that "*Ruskin Fields (SHLAA ref: 463) extends to 3.62ha and is available, deliverable, and capable of providing c. 130 homes in the first five-year local plan period".*

A) The minimum quantum of development - Changes Required

4.1.14 For the reasons stated above, at no point has the Council provided justification for the minimum capacity of the site to be 28 dwellings.

4.1.15 This minimum requirement does not reflect the aspirations elsewhere in the plan and the national planning policy framework to make efficient use of the land available.

[4] oxford-strategic-housing-land-availability-assessment-shlaa-january-2026-appendices

[5] sustainability-appraisal-oxford-local-plan-2045-appendix-c---site-assessments

4.1.16 Further the Promoter has been working with the Council as part of separate pre-application discussions to seek to agree an approach to bring forward an outline application at the Site. The information shared as part of this process has identified that the site has a far greater capacity with a minimum of 130 dwellings.

4.1.17 It is therefore requested that the draft policy wording be amended to refer to a minimum 130 dwellings at the site as follows:

"*Policy SPE14: Ruskin Field*

Planning permission will be granted for residential development, which may include employer-linked affordable housing or student accommodation. The minimum number of dwellings to be delivered is ~~28~~ 130. Other complementary uses will be considered on their merits.

B) Policies Map and Site Plan

4.1.18 The policies map identifies the proposed extent of the site allocation Ruskin Field (SPE14) (Fig 1). In addition, the Submission Draft Local Plan also contains at page 89 an additional plan identifying the extent of the proposed allocation at Ruskin Field (SPE14) (Figure 2).

Figure 1 Policies Map Extract



Figure 2 Extract of Site Plan as taken from Page 89 of Submission Draft Local Plan



4.1.19 Both the policies map and the additional plan do not include the proposed access via Foxwell Drive as part of the proposed policy area, despite the draft policy wording stating "*n) Foxwell Drive is likely to provide the only option for vehicular access."*

4.1.20 The proposed access has been the subject of discussion with OCC Highways and there is in principle agreement to access to be taken via Foxwell Drive. The specific detail of the access

arrangements will be informed by further discussion with OCC an indicative Site Plan is contained at **Appendix 1**. It is acknowledged that the access will need to have a bespoke alignment and arrangement to minimise conflict with the existing trees and their root protections zones. The access will be wide enough to accommodate two passing vehicles and dedicated footway. The access arrangements will be tracked to ensure safe access for larger vehicles such as fire trucks and refuse vehicles.

B) Policies Map and Site Plan - Changes Required

4.1.21 In order to improve the effectiveness of the LP and the deliverability of the site it is requested that the policies map is amended to include land to the west, to accommodate the proposed access, to connect to Foxwell Drive as identified at Appendix 1.

C) Open Space to the South of the Site

4.1.22 Draft Policy SPE14 criterion *d)* seeks *"The southern part of the site should be kept as open space, with opportunities taken for enhancement, particularly of any wetland features, and/or extension of the deciduous woodland priority habitat to the south."*

4.1.23 *In addition SPE14 criterion* i) seeks *"Built development should avoid the southern part of the site where there is a pond with potential for wetland species, and a greater potential for peat deposits. This area should be used for enhancements to biodiversity and green infrastructure.*

4.1.24 Whilst it is noted that there is priority habitat to the south of the Site, including ponds beyond the Site to the south, it is reiterated that there is no on site pond. This reference may refer to areas of pooling associated with surface water flooding.

4.1.25 There will be appropriate offset between existing trees, hedgerows, and enhanced landscaping proposed to retain corridors of activity for biodiversity but there is no justification for the entirety of the southern part of the site to be kept as open space as suggested in the draft policy wording.

4.1.26 Further the policy wording is not effective in so far as it does not specify the amount of open space required, as such if it were to be retained then it would be ambiguous to both developers and decision takers.

C) Open Space to the South of the Site - Changes Required

4.1.27 In order for the site allocation policy requirements to be found sound, it is suggested that draft policy SPE14 criterion d) and i) should be removed and amended to read:

4.1.28 "d)*The site shall incorporate measures to secure biodiversity net gain, the Council would encourage: extension and enhancement of the deciduous woodland priority habitat to the south of the Site; and integrated blue green infrastructure."*

D) Important Views and Building Heights

Oxford Historic Core and Elsfield View Cone

4.1.29 Draft Policy SPE14 criterion h) states: "*h)Buildings should be carefully placed to retain important views across the site and visual link with rural hills beyond, e.g. the important view from Stoke Place across the site to Elsfield (Policy HD6)."*

4.1.30 Criterion h) cross references to Policy HD6 'Views and Building Heights' which states *"planning permission will only be granted for development that will retain or enhance the special significance of views of the Historic skyline of the Historic Core Area*". It is reiterated as a matter of fact, that the site itself does not form part of the view cone from Elsfield towards the Historic Skyline of the Historic Core of Oxford as identified on the proposed policies map and

in the View Cones Assessment (2015).

4.1.31 Further, it has been demonstrated as part of site assessment that built development at the site would not be able to be perceived from the Historic Core of Oxford. As such cross reference to Policy HD6 in respect of the view stated in criterion h is not justified.

4.1.32 The Assessment of Oxford View Cones 2015 report identifies a view towards Oxford from Elsfield in which the focus is the historic core. It is noted that reference is made to the wider skyline at Figure 4.1.3. The text highlights that "*Both the John Radcliffe Hospital and Plowman Tower are large rectangular structures using white painted render that catches the eye and draws it away from the historic centre".*

Oxford Sky Line

4.1.33 It is recognised that the site forms part of a distant view from Elsfield towards Old Headington, Oxford as identified at Figure 4.1.3, but for clarity it does not form part of the Historic Core to which Draft Policy HD6 is focused.

4.1.34 Further the Council has not updated its evidence base to reflect the recent changes in proximity to the Site and is therefore reliant on the View Cone Assessment (2015). Importantly there has been development at the Rookery, a modern development at Ruskin College, and development at Barton Park which is currently under construction. It is recommended that the Council updates its evidence base accordingly to take account of this.

4.1.35 It is acknowledged that the proposal at the Site will introduce built development into a currently undeveloped site at the edge of Oxford, but it is clear that this will be appreciated in the context of the large John Radcliffe Hospital building, the recent development at Ruskin College, and development at Barton Park. It is acknowledged that appropriate placement of scale, massing and siting of buildings alongside landscaping will be required at the Site.

4.1.36 In summary, the Promoter does not disagree with the requirement for buildings to be carefully placed within the Site but the justification has not been correctly articulated within criterion h.

View from Stoke Place towards northern hills

4.1.37 The view from Stoke Place across the eastern field parcel, as referred to at criterion h, is identified as part of the Old Headington Conservation Area Appraisal (July 2011). Again the Council has not updated its evidence base to reflect the recent development at Ruskin College itself, nor taken into account the development at Barton Park which is currently under construction.

4.1.38 The Promoter has undertaken assessment of this view in February 2026. Whilst it is possible to perceive the hills to the north, towards Elsfield, it is also possible (and move obvious) to perceive the Barton Park development under construction (beyond the A40), and it is within this context the Site is being developed.

4.1.39 It has been demonstrated through and emerging evidence base and consultation with the Council that through appropriate design principles, scale, massing, incorporating green corridors and significant areas of public open space, views towards the wider northern hills can be retained. It should be noted that significant public open space is proposed with new public rights of way through the Site. This will provide public access to the Site which will provide the opportunity for more people to appreciate views towards the northern hills.

Building Heights

4.1.40 Policy SPE14 criterion j) states: *j) Development should be kept low to reflect the rural character and role of the site in linking the conservation area to its more rural origins.*

4.1.41 Further, policy SPE14 criterion j is not effective. The wording *"development should be kept low"*, suggests a desire to control the height of the proposed development but the wording is currently subjective and not justified. It does not reflect the varied topography of the Site, the notable recent change in context as a result of recent development at Ruskin College and Barton Park, and the enclosure afforded by the existing boundary trees, hedgerow and vegetation which is proposed to be further enhanced.

4.1.42 The Promoter has undertaken extensive analysis of the Site and its surrounding context to identify and refine the development opportunity at the site, including views analysis. Initial studies indicate that there is potential for the site to accommodate development of up to 3 to 4 storeys without significantly impacting heritage assets including the Old Headington Conservation Area, Ruskin College (The Rookery) and the Historic Core of Oxford by making use of the existing topography and heights of existing trees along and within the site boundaries. It is premature to restrict the height of the development at this stage, rather this should be informed by testing through the design development process to ensure a form of development that reflects the site context.

4.1.43 Whilst it is acknowledged that the Site is located within the Conservation Area, it is considered that the original context of the Old Headington Conservation has changed signficantly. The impact of the proposal upon the Conservation Area will be addressed via proposed alternative wording to criterion l).

D) Important Views and Building Heights – Changes Required

4.1.44 Draft Policy SPE14 criterion h) and j) should be removed and amended to read:

4.1.45 *h) Buildings should be carefully placed to retain views towards the rural hills to the north of Oxford. Buildings should be of an appropriate height to not be overly dominant in the skyline so not to detract from the Historic Core of the Oxford skyline and would not substantially harm the Old Headington Conservation Area.*

4.1.46 It is considered that this wording better reflects the available evidence base and intended aspirations for the policy as such would be better justified.

E) Heritage Impact Assessment

4.1.47 The National Planning Policy Framework states:

> *"208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*

4.1.48 The Council's evidence base includes a 'Heritage Impact Assessment Local Plan 2045' but this does not relate to the Site.

4.1.49 The Promoter has commissioned a Heritage Impact Assessment from a suitably qualified heritage consultant. Their baseline assessment of the current heritage context has informed the assessment of the site's constraints and opportunities for development. It has been used to inform the assessment of the site capacity of 130 dwellings.

4.1.50 The Draft Policy wording of SPE14 makes various reference to the Site being located within the Conservation Area and criterion l) states '*l) Development should be sensitive to the setting of the listed buildings nearby (Policy HD3)'.*

E) Heritage Impact Assessment – Changes Required

4.1.51 It is considered, to make criterion l) more effective and consistent with other policy requirements, the wording should be amended as follows:

l) Development must be accompanied by a Heritage Impact Assessment to assess the impact of proposal upon designated assets (Policy HD3) and non designated heritage assets (Policy HD4).

Full Suggested Amended Wording of Policy SPE 14

"***Policy SPE14: Ruskin Field***

Planning permission will be granted for residential development, which may include employer-linked affordable housing or student accommodation. The minimum number of dwellings to be delivered is 130 ~~28~~ (or, if delivered as self-contained student rooms, the equivalent number of rooms when the relevant ratio is applied. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The green character of the site is important to the setting of the Old Headington Conservation Area. The hedgerows and treelines are likely to have ecological value. For this reason, trees and hedgerows at the boundaries of the site and running through the site should be retained as far as possible, and opportunities taken for enhancement.

b) New native hedge and tree planting should connect existing trees and hedgerows.

c) Gardens and amenity spaces will need to have rich planting along boundaries to allow more diverse networks through the site for wildlife.

~~*d) The southern part of the site should be kept as open space, with opportunities taken for enhancement, particularly of any wetland features, and/or extension of the deciduous woodland priority habitat to the south.*~~

d) The site shall incorporate measures to secure biodiversity net gain, the Council would encourage: extension and enhancement of the deciduous woodland priority habitat to the south of the Site; and integrated blue green infrastructure.

e) Detailed biodiversity surveys will be required at the right times of year to ascertain which if any protected species are present and any mitigations that may be needed.

f) Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (Policy R6). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

g) Significant green features should be incorporated to retain the function of the site as one of the few vestiges of the rural character of the conservation area, important to its setting and understanding its history.

~~*h) Buildings should be carefully placed to retain important views across the site and visual link with rural hills beyond, e.g. the important view from Stoke Place across the*~~

~~*site to Elsfield (**Policy HD6**).*~~

h) Buildings should be carefully placed to retain views towards the rural hills to the north of Oxford. Buildings should be of an appropriate height to not be overly dominant in the skyline so not to detract from the Historic Core of the Oxford skyline and would not substantially harm the Old Headington Conservation Area.

~~*i) Built development should avoid the southern part of the site where there is a pond with potential for wetland species, and a greater potential for peat deposits. This area should be used for enhancements to biodiversity and green infrastructure.*~~

~~*j) Development should be kept low to reflect the rural character and role of the site in linking the conservation area to its more rural origins.*~~

i) Development must be accompanied by a Landscape Visual Impact Assessment to demonstrate impacts.

~~*l) Development should be sensitive to the setting of the listed buildings nearby (**Policy HD3**).*~~

j) Development must be accompanied by a Heritage Impact Assessment to assess the impact of proposal upon designated assets (Policy HD3) and non designated heritage assets (Policy HD4).

*j) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).*

Movement & access

k) Vehicular access is to be provided via Foxwell Drive ~~is likely to provide the only option for vehicular access.~~

l) Stoke Place is not suitable for providing vehicular access, but access to it for walkers, cyclists and wheelers should be considered in order to ensure permeability.

Additional Requirements

m) Due to potential impacts of noise and other pollutants from traffic on the A40, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (Policies R4 and R8).”

5 Policy H4: Employer-Linked Affordable Housing

5.1.1 The draft Local Plan recognises at page 7 that:

"Employers in Oxford, including critical services such as the NHS, are facing significant challenges in recruiting and retaining staff because of the shortage of homes that are affordable to local people working in Oxford on average Oxford salaries. People can be discouraged from taking jobs in Oxford if they cannot afford to live close enough to their place of work.

Many jobs in Oxford still require people to attend their workplaces because they are jobs that are not possible to do remotely, such as in frontline healthcare, and R&D labs, cleaning and servicing. Many of these workers may find themselves living away from the city, with expensive and time-consuming commutes, or living in shared accommodation in Oxford that is too small for their needs. People with no option but to rent a room in a house-share can be prevented from moving on with their lives with a partner or family."

5.1.2 The Site Allocation at Ruskin Field (Daft Policy SPE14) is specifically allocated for "…*residential development, which may include employer-linked affordable housing or student accommodation…"* which is supported. It is clear that the Site is well related to the John Radcliffe Hospital, an employer referred to as part of Policy H4, and residential development at the site could provide significant benefits to employees, including a reduction in community and opportunity to live in a high quality development.

5.1.3 The supporting text at page 8 of the draft Local Plan states:

"*In the event that market housing is also provided on the site then Policy H2 is engaged on the market housing element. The employer-linked affordable housing could then contribute to the requirement for the intermediate element within Policy H2 but could not be relied on to meet the social rent tenure requirement within Policy H2.*" (page 8 of draft Local Plan).

5.1.4 The supporting text helpfully clarifies it is possible to bring forward a mixture of market housing, affordable housing and employer-linked affordable housing as part of a proposal; which is being considered as part of the proposal at the Site.

6 Policy S2: High-Quality Design

6.1.1 The NPPF states:

"131. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."

6.1.2 Support is given to the Council for setting out the requirements for a holistic approach to design as part of Draft Policy S2. The policy reflects the themes of the National Model Design Code and cross refers to other supporting local guidance.

6.1.3 Draft Policy S2 also cross refers to the 'Design Checklist' contained at Appendix 1.1 of the Local Plan. The Design Checklist draws together themes and policies throughout the plan to foster the holistic approach to design. Appendix 1.1 repeats proposed policy wording from throughout the Local Plan, the wording of which we have made comments on separately in this representation.

6.1.4 It is questioned whether the checklist needs to form part of the Local Plan itself, and whether it would be more user friendly as a standalone guidance document to support the Local Plan. If the checklist is to remain in the Local Plan, it is necessary that any amendments to draft policy wording is also updated in the Appendix for consistency.

7 Policy HD4: Non-Designated Heritage Assets

7.1.1 The draft policy wording of Policy HD14 states that *"A non-designated building or group of buildings, monument or site, place or landscape will be considered a local heritage asset if it has local interest, value, and significance*." Further it states that "*These assets may be identified in a number of ways such as through the Oxford Heritage Assets Register, conservation area appraisals, or the planning application process.*"

7.1.2 To make draft policy HD4 more effective, in order to assist Developers and decision takers alike, it is considered necessary to establish some criteria upon which non-designated heritage assets pertaining to be 'local heritage assets' can be classified. It is suggested that a similar approach could be taken to that contained at Appendix G of the Cambridge City Local Plan (2018). Extract provided below for ease of reference.

Appendix G: Local heritage assets criteria and list

G.1 Linked to Policy 62, local heritage assets, the Council maintains a list of local heritage assets, including buildings of local interest. This list may be updated from time to time.

G.2 A local heritage asset is one that is not already statutorily listed, but is of significant architectural interest within the context of Cambridge. An asset may be included on the list for its architectural qualities alone, or because it has additional historical or social interest. Assets may be important in the social, political, industrial, economic or architectural history of Cambridge (for example, meeting places, social venues, places of entertainment, banks, places of worship, factories, almshouses, workhouses, transport-related buildings) or have a strong connection with a notable person.

G.3 The following criteria define significant interest for the purpose of the list. An asset may fulfil one or more of the criteria:

a. age and integrity – any building dating from before 1840 which exists in a style, form and construction similar to the original;
b. architectural quality – very high quality design and use of materials, and strong aesthetic appeal;
c. architectural style – typical or rare surviving examples of particular architectural styles, building materials or building forms;
d. well-known architect – high quality work of notable architects, local or otherwise;
e. innovation – show considerable innovation in the use of materials or techniques, or very early examples of styles that became popular later;
f. group or streetscene value – contribute to a terrace, square, crescent or other group of buildings planned as a whole. Make a significant contribution to the streetscape, because of uniformity or contrast, or because they enclose or define an area or create a view. Groups of buildings that together fulfil one of the other criteria, architectural or historic;
g. landmark value – landmarks in the streetscene, whether because of size, height, architectural style, unusual building materials, a specific feature or any other reason;
h. historic interest – assets may also be included on the list if they are of substantial historic interest, provided they are also of architectural/design interest;
i. designed landscapes - relating to the interest attached to locally important designed landscapes, parks and gardens.

8 Policy HD5: Archaeology

8.1.1 A minor administrative point, the draft wording of the policy inaccurately cross references to other policies within the Draft Local Plan.

8.1.2 Policy HD5 should read:

8.1.3 Proposals which would or may affect archaeological deposits or features that are designated heritage assets will be considered against the relevant policy approach (Draft Policy ~~HD2 Listed Buildings~~HD3 Designated Heritage Assets and HD4 Non-Designated Heritage Assets ~~Draft Policy HD4 Scheduled Monuments~~).

9 Policy HD6: Views and Building Heights

9.1.1 The draft wording of Policy HD6 'Views and Building Heights' states "*Planning permission will only be granted for development that will retain or enhance the special significance of views of the historic skyline of the Historic Core Area."*

The historic skyline of the Historic Core Area

9.1.2 The Historic Core Area, along with designated View Cones, are identified on the Proposed Policies Map as such there should be no ambiguity to the requirement to comply with this policy, although draft Policy HD6 also refers to the consideration of the setting of View Cones which will require some judgement.

Tall Buildings

9.1.3 The draft policy also relates to any proposed building of 15m in height or more, or the height that the High Buildings TAN says may be impactful in that area if that is higher.

Comments

9.1.4 To improve the effectiveness of the policy it should be made clear which part of Policy HD6 relates to sites within the Historic Core Area and designated View Cones, and which part of the policy relates to proposed 'tall buildings', or if necessary separate out the policy into 2 different policies.

9.1.5 It is considered that the policy needs to be clear about what the threshold is for a 'tall building' in order to make the policy effective rather than cross referencing to technical advice notes which do not form part of the Development Plan. It may not always be necessary to complete additional site assessment, particularly where there is no intervisibility with the Oxford Historic Core as identified through assessment of the Zone of Theoretic Visibility.

9.1.6 It is questioned why the policy has suggested the threshold of 15m, and whether it would be more appropriate to set a higher threshold.

9.1.7 It is recommended that should it be demonstrated through assessment of the Zone of Theoretic Visibility that the proposed tall building would be visible from to the Historic Core of Oxford, then further assessment would be required.

9.1.8 Further, the policy requests the use of both Visual Impact Assessment, a typical request, and use of VuCity 3D modelling to understand the townscape impacts of the scale and massing of the proposal. It is however questioned whether endorsement of a specific 3D modelling product, in this case, VuCity, should be incorporated as part of the policy requirement as it is possible to use various models on the market to demonstrate the same output. Reference is also made to the use of VuCity at B.3 of Appendix 1.1 of the draft Local Plan relating to the 'Design Checklist' cross referred to by Policy HD1.

Suggested Amended Policy Wording

9.1.9 It is suggested that Policy HD6 is amended to read as follows:

"Building Heights:

All buildings should be of an appropriate height to not be overly dominant in the skyline, so not to detract from the Historic Core of the Oxford Skyline.

Tall Buildings

Tall buildings are defined as greater than 18m.

Applications for any buildings that exceed 18 metres which has the potential to be viewed from Oxford's Historic Core, or within the designated View Cones and their settings, will be required to provide information so that the impacts of any proposals can be understood and assessed, including:

- *A Visual Impact Assessment, which includes the use of photos and verified views produced and used in a technically appropriate way, which are appropriate in size and resolution to match the perspective and detail as far as possible to that seen in the field, representing the landscape and proposed development as accurately as possible (produced in accordance with the Landscape Institute's GLVIA 3d Edition and Technical Guidance note TGN 06 19 or updated equivalents); and*

- *3D modelling, shared with the City Council so that the impact of the development can considered from different locations; and*

- *A Heritage Impact Assessment; and*

- *A Design and Access Statement which provides a clear design rationale."*

10 Policy G3: Provision of new Green and Blue Features – Urban Greening Factor

10.1.1 In addition to the requirement for developments to deliver a 10% net gain in biodiversity, draft Policy G3 seeks development sites to achieve a minimum score of urban greening measured as the 'urban greening factor' (UGF) using the scoring provided at Appendix 4.1.

10.1.2 In respect of Green Belt, the National Planning Policy Framework states:

"159. The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes."

10.1.3 Whilst the principle of urban greening is supported, it is considered that draft policy G3, proposed to be applied as a blanket to all development sites, not those just within the Green Belt or at brownfield development sites, could act as an excessive technical requirement for development at entirely greenfield sites.

10.1.4 The Natural England guidance 'Urban Greening Factor for England User Guide Green Infrastructure Framework Standards for England' (January 2023)[6] states:

"UGF is a planning tool that focuses on the greening of urban areas, and it is recommended that it is applied through planning policy to areas and districts that are predominantly urban or suburban in character. Where appropriate its use can also be targeted to development sites and locations where the level of urban greening is a significant planning issue or requirement. This may include the redevelopment of brownfield or post-industrial sites in rural locations or the creation of garden communities that would be expected to provide a significant proportion of green infrastructure across the entire development.

10.1.5 In order to better conform with the requirements of the NPPF and Natural England Guidance, it is considered that Policy G3 should be amended so that it is targeted to development sites and locations where the level of urban greening is a significant planning issue such as at re-development of brownfield sites and at sites located in the Green Belt.

10.1.6 In respect of Ruskin Field, the draft local plan states at page 89 of the Draft Local Plan that "*the site is likely to score above the Urban Greening Factor target"*. It is acknowledged that the proposal incorporates significant on site green infrastructure at the site but it is questioned how the Council has made this judgement when the calculation incorporates detailed consideration of landscape proposals. It is also questioned whether this judgement is linked to the perceived capacity of the site to be a minimum of just 28 dwellings.

Suggested Amended Policy Wording

10.1.7 It is suggested that Policy R6 is amended to read as follows:

"An appropriate proportion of natural green surface cover – which may be comprised of both existing and newly installed features – will need to be demonstrated on certain proposals (as set out below) and evidenced via submission of a completed Urban Greening Factor (UGF) assessment.

[6] Urban Greening Factor for England User Guide

Applicants are expected to assess and submit the baseline score for the site pre-development, prior to any site clearance, as well as the proposal as-built/post-development. The as-built/post-development score required for development proposals will need to meet the following policy criteria:

Major brownfield redevelopment/ major development located within the green belt:
proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of:
a) 0.3 for residential or predominantly residential schemes
b) 0.2 for predominantly non-residential schemes

Major development on wholly greenfield sites located within the green belt:
proposals should demonstrate that there would be no reduction in baseline score, unless this can be demonstrated to be technically infeasible, and achieve a minimum score of:
c) 0.4 for residential or predominantly residential schemes
d) 0.3 for predominantly non-residential schemes

All other forms of development ~~(such as minor development)~~ are encouraged to demonstrate how they have undertaken greening of their site. ~~through use of the UGF assessment, though this is not mandatory.~~

Along with the submitted UGF assessment, all greening features proposed for the development and used in the calculation of the UGF score should be clearly demonstrated on associated landscaping/elevation plans in the application.

The adopted calculation formulae and the factors for various surface cover types are outlined in Appendix 4.1."

11 Policy R6: Soil

11.1.1 Draft Policy R6: Soil states:

"Planning applications will be expected to demonstrate how the impact of development on soils has been mitigated and opportunities for conserving and enhancing the capacity/quality of soil maximised. The Design and Access Statement and associated landscape plans should include details identifying where relevant:
a) How impact on soils during the construction process has been minimised through avoiding: soil loss, compaction, pollution and reduction in the quality of soil; and
b) How development has been located in a way that avoids highest quality soils on sites where possible; and
c) How beneficial soil reuse and sustainable soil management has been implemented where possible; and
d) How artificial surface cover that seals off soils has been minimised.

Planning permission will not be granted for proposals that would remove or dewater 10m³ or more of peat.

Proposals for new major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the City Council to determine any potential impacts on reserves. The assessment should include details of the following:
I The estimated carbon footprint of the peat impacted by development;
II Its palaeo-archaeological interest;
III Its function in the surrounding habitats;
IV Its hydrological condition and stability.

11.1.2 It is noted that NPPF requires planning policies and decisions to contribute to and enhance the natural local environment by: *a) protecting and enhancing… sites of geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil,… pollution or land instability".*

11.1.3 It is however reiterated that soils need to be protected in a manner commensurate with their statutory status and identified quality, as such it is not considered justified to request such detail for applications at all sites.

11.1.4 It is questioned what the justification is for the proposed threshold of 10m³ for removal or dewater of peat and how this can be effectively monitored across the habitat.

11.1.5 The first part of the policy sets out four proposed requirements for the Design and Access Statement and Landscape Plans at a) to d), however it is considered that not all these matters would be addressed within such types of documents as part of the application, but would be covered as part of a major application in other documents. For example:

- An agricultural land classification statement would identify the agricultural grade of land, seeking to avoid best and most versatile land where possible.

- A Geo-Environmental Desktop Study and Preliminary Risk Assessment (also known as Phase 1 Site Investigation) and subsequent ground testing as reported in Phase 2 Site Investigation would identify any potential for contamination and the approach to mitigation (if required), and would identify the stability of the ground. These matters are further controlled via draft policy R7 and R8.

- Proposed site levels, including any details of bunds – are typically shown on levels plans and landscape plans. Further details of levels can be controlled via condition.

- A Construction Management Plan (CMP) could provide details regarding movements

of soil and has the potential to identify construction methods, such as piling, if deemed necessary. A CMP can be controlled via condition attached to a planning application. There is currently reference to a CMP at Draft Policy C6 but this is focused upon transport aspects of the construction management plan.

Suggested Amendment to Policy Wording

11.1.6 It is suggested that Policy R6 is amended to read as follows:

Planning applications will be expected to demonstrate how the impact of development on soils has been mitigated and opportunities for conserving and enhancing the capacity/quality of soil has been maximised commensurate with their statutory status or identified quality. The ~~Design and Access Statement and associated landscape plans~~ Application Documentation should include details identifying where relevant:
a) How impact on soils during the construction process has been minimised through avoiding: soil loss, compaction, pollution and reduction in the quality of soil; and
b) How development has been located in a way that avoids highest quality soils on sites where possible; and
c) How beneficial soil reuse and sustainable soil management has been implemented where possible; and
d) How artificial surface cover that seals off soils has been minimised.

Planning permission will not be granted for proposals that would remove or dewater 10m³ or more of peat.

Proposals for new major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the City Council to determine any potential impacts on reserves. The assessment should include details of the following:
V The estimated carbon footprint of the peat impacted by development;
VI Its palaeo-archaeological interest;
VII Its function in the surrounding habitats;
VIII Its hydrological condition and stability.

12 Summary

12.1.1 This Representation relates to land known Rusk Fields and provides comments in response to the Regulation 19 draft Local Plan Consultation as summarised below.

Local Plan	Summary Comment
Policy H1 – Housing Requirement	Concern is raised about the approach taken to establish a capacity driven housing requirement. This is in the context when it is considered that there has been a significant underestimate in the capacity of proposed site allocation SPE14 Ruskin Field.
Policy SPE14 – Ruskin Field	Support is given to the identification of Ruskin Field as proposed allocation. However comments are made in response to the policy requirements as some are considered not to be adequately justified. Comments have also been made to seek to make the policy more effective to deliver the Promoter's identify capacity of a minimum of 130 dwellings at the Site.
Policy H4 – Employer-Linked Affordable Housing	Support is given to proposed Policy H4 and the supporting text which clarifies that employer-linked affordable housing can be delivered at sites in conjunction with market housing and other affordable housing, such as at proposed allocation Site Ruskin Fields (Policy SPE 14).
Policy S2 – High Quality Design	Support is given to policy S2 but comments are made about the appropriateness for the 'Design Checklist', which repeats other policy requirements, to be contained as part of the Local Plan. If the Design Checklist is to remain as part of the Local Plan it is necessary for the wording to be consistent with any changes to policy wording.
Policy HD4 'Non-Designation Heritage Assets'	To make draft policy HD4 more effective, it is considered necessary to establish some criteria upon which non-designated heritage assets pertaining to be 'local heritage assets' can be classified.
Policy HD5 'Archaeology'	Minor administrative comment is made to correct policy referencing.
Policy HD6 'Views and Building Heights'	To improve the effectiveness of the policy it should be made clear which part of Policy HD6 relates to sites within the Historic Core Area and designated View Cones, and which part of the policy relates to proposed 'tall buildings', or if necessary separate out the policy into 2 different policies. Suggested policy amendments are proposed to provide clarity to the wording to better relate to the aspirations of the policy to retain and enhance the historic skyline of the Historic Core Area.

Policy G3 'Green Infrastructure – Urban Greening Factor'	Whilst the principle of urban greening is supported, it is questioned whether it is appropriate to apply a blanket policy across all sites. With reference to the National Planning Policy Framework and Natural England Guidance it is suggested that urban greening should targeted to development sites and locations where the level of urban greening is a significant planning issue such as re-development of brownfield sites and sites located in the Green Belt.
Policy R6 'Soil Quality'	In order for the policy to comply with the National Planning Policy Framework, it is necessary for the policy to reflect that soils need to be protected in a manner commensurate with their statutory status and identified quality. Suggested policy wording amendments are proposed to better conform with the requirements of the National Planning Policy Framework.

Ruskin Fields

12.1.2 The Promoter confirms that Ruskin Fields is suitable, available, and deliverable, with the potential to provide a minimum of 130 homes over the first five years of the new local plan period.

12.1.3 The Site is available now and is under the control of the Promoter, Welbeck Land. These representations have explained that OCC currently control the access land and progress has been made towards the sale of land to Ruskin College to deliver the access.

12.1.4 The Site has been the subject of initial technical assessment which has been shared with OCC in response to the Regulation Local Plan Consultation and as part of ongoing discussions with Planning Officers.

12.1.5 The technical evidence base is being supplemented as the Promoter works towards a planning application, anticipated to be submitted in 2026.

12.1.6 Whilst support is given to the identification of the site as a draft allocation SPE 14 within the emerging Local Plan, serious concern has been raised about the suggested underestimated capacity of just 28 dwellings.

12.1.7 The Promoter intends to continue to engage with OCC and stakeholders as the Local Plan progresses to support the allocation. In addition, further pre-application engagement will be completed to support a forthcoming planning application for residential development at the Site, combining a thorough assessment of the site's context, and sensitive design approach to the proposal which incorporates necessary mitigation.

Appendix 1 – Site Location Plan

